

Morgan, Lewis & Bockius LLP
101 Park Avenue
New York, NY 10178-0060
Tel. 212.309.6000
Fax: 212.309.6001
www.morganlewis.com

Morgan Lewis
C O U N S E L O R S A T L A W

Thomas A. Linthorst
609.919.6642
tlinthorst@morganlewis.com

July 1, 2014

VIA ECF

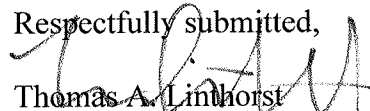
The Honorable Colleen McMahon
United States District Judge
U.S. District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Saju Varghese v. JPMorgan Chase Bank, N.A. et al.
Docket No. 14-cv-1718-CM-KNF

Dear Judge McMahon:

We represent Defendants in this matter and write with respect to the Court's Minute Entry following the telephone conference on June 27, 2014. In particular, the Court provided Defendants until July 3 "to provide the Court with authority for the proposition that this Court may enjoin counsel for Plaintiff from filing other, related actions with other named plaintiffs in other jurisdictions."

We have discussed the matter with our clients. Although we believe the Court has the authority to issue such an injunction under the All Writs Act, 28 U.S.C. § 1651, and related case law, we have decided not to seek an order at this time enjoining Plaintiff's counsel from filing other, related actions with other named plaintiffs in other jurisdictions. No such action has been filed yet, and Plaintiff's counsel have not disclosed their intentions. In the event they file another related action with other named plaintiffs in other jurisdictions, we will address how such case should be handled (including whether such case should be transferred to this Court and related with this case) with the appropriate court at that time.

Respectfully submitted,

Thomas A. Linthorst

c: All counsel of record (via ECF)